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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

9 SAN JOSE DIVISION

E-FILED - 9/12/07

11 RAMBUS INC.,
12 Plaintiff,

13 v.

14 HYNIX SEMICONDUCTOR INC.,
15 HYNIX SEMICONDUCTOR AMERICA
16 INC., HYNIX SEMICONDUCTOR
17 MANUFACTURING AMERICA INC.,

18 SAMSUNG ELECTRONICS CO. LTD.,
19 SAMSUNG ELECTRONICS AMERICA
20 INC., SAMSUNG SEMICONDUCTOR
21 INC., SAMSUNG AUSTIN
22 SEMICONDUCTOR L.P.,

23 NANYA TECHNOLOGY
24 CORPORATION, NANYA
25 TECHNOLOGY CORPORATION U.S.A.

26 Defendants.

27 AND RELATED CROSS-ACTIONS.
28

CASE NO. C 05-00334 RMW

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER REGARDING DATES FOR
SUBMISSION OF: (1) RAMBUS'S
OPPOSITION TO HYNIX'S MOTIONS TO
STRIKE RAMBUS'S AFFIRMATIVE
DEFENSES; AND (2) HYNIX'S REPLY TO
RAMBUS'S OPPOSITION TO HYNIX'S
MOTIONS TO STRIKE RAMBUS'S
AFFIRMATIVE DEFENSES**

Hynix Semiconductor Inc., Hynix Semiconductor America Inc., Hynix
Semiconductor U.K. Ltd., Hynix Semiconductor Deutschland GmbH (collectively, "Hynix") and
Rambus Inc. ("Rambus"), hereby submit the following joint stipulation and proposed order:

WHEREAS, Hynix has submitted the following outstanding motions to strike:

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CASE NOS. C 00-20905; C 05-00334;
C 05-02298; C 06-00244 RMW
JOINT STIPULATION AND ~~PROPOSED~~ ORDER

- “Motion to Strike Rambus’s Second, Fourth, Fifth, Sixth, Seventh, Ninth, Eleventh, Twelfth, Thirteenth, Fifteenth, Sixteenth and Nineteenth Affirmative Defenses or In the Alternative Request for Additional Discovery”, CV 05-00334, Dkt. No. 290 (Jul. 30, 2007);
- “Motion to Strike Rambus’s *New* Affirmative Defenses”, CV 05-00334, Dkt. No. 375 (Sept. 6, 2007);

WHEREAS, these outstanding motions were both set to be heard on October 26, 2007;

WHEREAS, Rambus’s Opposition to the first of these motions was due to be filed September 25, 2007 and Hynix’s Reply to Rambus’s Opposition was due to be filed on October 12, 2007;

WHEREAS, Rambus’s Opposition to the second of these motions was due to be filed October 5, 2007 and Hynix’s Reply to Rambus’s Opposition was due to be filed October 12;

WHEREAS, upon review of the motions, Rambus requested that the motions be considered one motion, with one Opposition brief by Rambus and one Reply brief by Hynix addressing both motions, and the parties agreed;

WHEREAS, the parties agreed to the briefing schedule set forth below;

THEREFORE, IT IS ORDERED THAT:

(1) Rambus shall respond to these two outstanding motions by Hynix with one Opposition, which shall be filed on October 1, 2007;

(2) Hynix shall respond to Rambus’s Opposition brief with one Reply, which shall be filed on October 12, 2007.

SO ORDERED.

DATED: 9/12/07

Ronald M. Whyte

HON. RONALD M. WHYTE

1 ON BEHALF OF HYNIX:

2 DATED: September 10, 2007

Respectfully submitted,

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21 HYNIX SEMICONDUCTOR
22 AMERICA INC., HYNIX
23 SEMICONDUCTOR U.K. LTD.,
24 and HYNIX SEMICONDUCTOR
25 DEUTSCHLAND GmbH

ON BEHALF OF RAMBUS:

DATED: September 10, 2007

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